

## EPSTEIN DRANGEL LLP

60 East 42nd Street, Suite 1250, New York, NY 10165 **T:** 212.292.5390 • **E:** mail@ipcounselors.com **www.ipcounselors.com** 

March 26, 2025

## **VIA ECF & FAX**

Hon. Alvin K. Hellerstein United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007 The preliminary injunction hearing is adjourned to April 9, 2025 at 11:00 a.m. SO ORDERED.
4.1.25 /s/ Alvin K. Hellerstein

Re: Denim Tears, LLC v. Shenzhen Xiaotangren Technology Co., Ltd., et al.

Case No. 24-cv-5675 (AKH)

Letter Requesting to Adjourn Preliminary Injunction Hearing

Dear Judge Hellerstein,

We represent Plaintiff Denim Tears, LLC ("Plaintiff") in the above-referenced action (the "Action"). By Order dated March 20, 2025, the Court granted Plaintiff's request to submit additional supplemental briefing on its Application for a Preliminary Injunction Order and adjourned the preliminary injunction hearing to April 3, 2025 at 11:00 a.m. Unfortunately, Plaintiff's counsel has a conflict on April 3, 2025 and respectfully requests to adjourn the preliminary injunction hearing.

In accordance with Your Honor's Individual Rules, Plaintiff submits the following:

- i. The Original Date: April 3, 2025 at 11:00 a.m.;
- ii. The Number of Previous Requests for Adjournment: The parties requested to adjourn the continued preliminary injunction hearing twice to engage in settlement discussions, but this is the first request to adjourn the preliminary injunction hearing after the supplemental briefing has been filed;
- **Whether Previous Requests Were Denied/Granted:** The Court granted the parties' previous requests;
- iv. Whether Adversary Consents: Plaintiff's counsel conferred with counsel for Defendants who consents to Plaintiff's request;
- v. All Other Dates Previously Scheduled: None;
- vi. Proposed Alternate Dates: After conferring with counsel for Defendants, the parties are available to appear for a preliminary injunction hearing on April 4, 2025 (Plaintiff's counsel is available any time after a previously scheduled 10:00 a.m. hearing before the Honorable Valerie E. Caproni in another matter), April 7, 2025, April 8, 2025 or a date that is most convenient for the Court.

Hon. Alvin K. Hellerstein March 26, 2025 Page **2** of **2** 

We thank the Court for its time and consideration.

## Respectfully submitted, **EPSTEIN DRANGEL LLP**

BY: /s/ Danielle S. Futterman
Danielle S. Futterman (DY 4228)
dfutterman@ipcounselors.com
60 East 42nd Street, Suite 1250
New York, New York 10165
(212) 292-5390
Attorneys for Plaintiff

